



**VIA ECFS**

January 17, 2013

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
TW-A325  
Washington D.C. 20554

**Re: UPDATED INFORMATION AND COMMENT SOUGHT ON REVIEW OF HEARING AID  
COMPATIBILITY REGULATIONS [WT Docket No. 10-254; DA 12-1745]**

Dear Ms. Dortch:

The Rehabilitation Engineering Research Center for Wireless Technologies (Wireless RERC)<sup>1</sup> mission is to research, evaluate and develop innovative wireless technologies and products that meet the needs, enhance independence, and improve the quality of life and community participation of people with disabilities. Our consumer research team conducts surveys, focus groups and product evaluations to collect qualitative and quantitative data on a variety of use and usability content areas, including mobile user interfaces, device features, apps, emergency alerting, access to 911 and mobile social media. One of the Wireless RERC's projects, *Policy Approaches to Promote Access to Wireless Technologies*, employs that data in the federal rulemaking process with evidence-based filings to inform the development of wireless technology policy and regulations that are inclusive of the needs of people with disabilities.

In response to the above referenced *Public Notice* the Wireless RERC would like to submit, in lieu of comments, this letter inviting the Wireless Telecommunications Bureau (WTB)

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<sup>1</sup> The Rehabilitation Engineering Research Center for Wireless Technologies (Wireless RERC) is sponsored by the National Institute on Disability and Rehabilitation Research (NIDRR) of the U.S. Department of Education under grant number H133E110002. The opinions contained in this filing are those of the authors and do not necessarily reflect those of the U.S. Department of Education or NIDRR.

to submit questions concerning hearing aid compatible (HAC) handsets and the user experience to our *2013 HAC Consumer Survey*. Attached for your review is a draft survey tool. We plan to launch the survey in Spring 2013, with analysis and findings available in late Summer 2013. We will submit ex parte comments on our final analysis for your use in determining the effectiveness of rules relating to HAC wireless handsets. To that end, we want to ensure we design the survey tool to capture information that addresses the following questions outlined in the request for comment section of the above-referenced *Public Notice*:

- Are consumers adequately informed about the capabilities of the new handsets and their functionality with hearing aids and cochlear implants?
- In particular, are consumers informed about the functioning of handsets that have a separate menu-driven mode for operation with telecoils, and that activating this mode may affect the phone's acoustic coupling performance?
- What are the benefits to consumers of having the information in the hearing aid compatibility reports available from the smallest service providers as well as the major national and regional carriers?

We hereby invite the staff of WTB and other relevant FCC staffers to submit specific language to include in the survey tool, and/or edit the existing questions. Should you have any questions concerning this letter or the enclosed draft survey, please do not hesitate to contact me via email at [helena.mitchell@cacp.gatech.edu](mailto:helena.mitchell@cacp.gatech.edu).

Respectfully submitted,



Helena Mitchell  
Principal Investigator, Wireless RERC  
Center for Advanced Communications Policy  
Georgia Institute of Technology

Cc: Jane E. Jackson, Associate Chief, Wireless Telecommunications Bureau (via e-mail)  
Jennifer Flynn, Spectrum & Competition Policy Division, Wireless Telecommunications Bureau (via e-mail)  
Karen Peltz Strauss, Deputy Bureau Chief, Consumer & Governmental Affairs Bureau (via e-mail)

Enclosure

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## Hearing Aid Compatibility 3-OCT-2012

### Hearing Aid Compatibility Survey

The Hearing Aid Compatibility Act of 1988 (HAC Act) requires that landline telephones manufactured or imported for use in the United States after August 1989 be hearing aid-compatible. In 2003, the Federal Communications Commission (FCC) adopted rules to make digital wireless telephones (cell phones) compatible with hearing aids and cochlear implants.

The Wireless Rehabilitation Engineering Research Center (Wireless RERC) monitors this regulation and is interested in how it impacts the usability of cell phones for people who use hearing aids and cochlear implants.

We invite people who use hearing aids or cochlear implants to participate in the survey regarding their use of cell phones. The purpose of this survey is to analyze the compatibility of hearing aids. We plan to conduct this survey annually to track any changes in cell phone and hearing aid compatibility.

Please try your best to complete all parts of this survey. Your answers are important to us, even if you don't use wireless technology. This survey can be completed by an assistant or caregiver for you if you are unable to complete it directly.

Your personal information will not be sold or used in any way other than for research related to this survey. Your personal data will be kept strictly confidential.

Please take the HAC survey and enter a drawing for the chance to win one of four \$50 Amazon gift certificates. Participation in the survey is not required to enter the drawing. Just provide your contact information for a chance to win.

#### ABOUT US

This survey is being conducted by the Rehabilitation Engineering Research Center for Wireless Technologies (Wireless RERC), which is funded by a 5-year grant from the U.S. Department of Education's National Institute on Disability and Rehabilitation Research (grant number H133E110002). For more information about the Wireless RERC, please visit us on the Internet at: [www.wirelessrerc.org](http://www.wirelessrerc.org).

If you have questions or need help with this survey, please contact:

Mark Sweatman  
404-367-1224  
[mark\\_sweatman@shepherd.org](mailto:mark_sweatman@shepherd.org)

#### 1. What is your hearing status?

- ☐ Hard of hearing
- ☐ Late-deafened
- ☐ Deaf (primarily use sign language to communicate)
- ☐ Deaf (oral – primarily use voice to communicate)

Other (please specify)

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### 2. What degree of hearing loss do you have?

- ☐ Mild
- ☐ Moderate
- ☐ Severe
- ☐ Profound
- ☐ Not sure

### 3. What kind of hearing technology do you use?

- ☐ Behind the ear aids
- ☐ In the ear aids
- ☐ Bone anchored hearing aids
- ☐ Cochlear Implant
- ☐ None

Other (please specify)

### 4. Do you currently use a cell phone?

- ☐ Yes
- ☐ No

### 5. Can you use your current cell phone while using your hearing aid or other hearing technology (i.e. cochlear implant)?

- ☐ Yes
- ☐ No
- ☐ Not sure
- ☐ N/A

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### 6. What, if any, assistive technology do you use to make your cell phone hearing aid compatible?

- ☐ Neck loop
- ☐ Amplifier
- ☐ Bluetooth
- ☐ Telecoil

Other (please specify)

### 7. How difficult was it to find a phone that works with your hearing aid or other hearing technology (i.e. cochlear implant)?

- ☐ Very difficult
- ☐ Difficult
- ☐ About average
- ☐ Easy
- ☐ Very easy
- ☐ N/A

### 8. How satisfied are you with your phone?

(i.e. clarity is good, you can hear and understand the person on the other end; volume is loud enough, etc)

- ☐ Very satisfied
- ☐ Satisfied
- ☐ About average
- ☐ Dissatisfied
- ☐ Very dissatisfied

## Hearing Aid Compatibility 3-OCT-2012

### 9. How did you find your phone?

(select all that apply)

- ☐ Recommendation (from friend, family member, audiologist, etc)
- ☐ Package label (microphone vs. telecoil compatible, etc )
- ☐ Sales person
- ☐ Researched online

Other (please specify)

### 10. When was the last time you changed cell phones?

- ☐ 12 months ago or less
- ☐ More than 1 year ago, but less than 2 years ago
- ☐ More than 2 years ago, but less than 3 years ago
- ☐ More than 3 years ago, but less than 4 years ago
- ☐ More than 4 years ago

### 11. Why did you choose to change phones?

## Part 2. About you

Instructions: Please select the answer that best describes you.

### 12. What is your gender?

- ☐ Male
- ☐ Female

### 13. What is your age?

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### 14. What is your ethnic background? (Check all that apply)

- ☐ Asian/Pacific Islander
- ☐ Black/African American
- ☐ Hispanic/Latino
- ☐ Native American
- ☐ White/Caucasian
- ☐ Other (please specify)

### 15. What is the highest level of education you have completed?

- ☐ Not applicable or no schooling
- ☐ Elementary school
- ☐ High school diploma or GED
- ☐ Some college, no degree
- ☐ Associate's degree
- ☐ Bachelor's degree
- ☐ Master's degree or doctoral degree

### 16. What is your annual gross household income?

- ☐ Less than \$10,000
- ☐ \$10,000-\$14,999
- ☐ \$15,000-\$24,999
- ☐ \$25,000-\$34,999
- ☐ \$35,000-\$49,999
- ☐ \$50,000-\$74,999
- ☐ \$75,000 or more

### 17. What is your ZIP Code?

Please enter your 5 digit ZIP  
Code

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### 18. Are you employed?

- ☐ Full-time  
☐ Part-time  
☐ Retired  
☐ Not employed

### 19. To be eligible for the drawing for one of four \$50 gift cards, please fill in the following contact information.

First Name:	<input type="text"/>
Last Name:	<input type="text"/>
Street Number and Name:	<input type="text"/>
Apartment or Unit Number:	<input type="text"/>
City/Town:	<input type="text"/>
State/Province:	<input type="text"/>
ZIP/Postal Code:	<input type="text"/>
Country:	<input type="text"/>
Email Address:	<input type="text"/>

### 20. Would you like to help make wireless products better by joining our Consumer Advisory Network (CAN)? CAN members may be invited to participate in other surveys, focus groups, or testing of wireless products and services.

- ☐ Yes, I would like to join the CAN. (My current contact information is listed above.)  
☐ I am already a member of the CAN. (My current contact information is listed above.)  
☐ No, I do not wish to join the CAN.